

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
The Use of N11 Codes and Other)	CC Docket No. 92-105
Abbreviated Dialing Arrangements)	

**REPLY COMMENTS OF THE
ILLINOIS DEPARTMENT OF TRANSPORTATION (IDOT)**

IDOT hereby submits its Reply Comments to the Comments filed to refresh the record regarding reconsideration of the Commission's designation of the 211 and 511 abbreviated dialing codes. IDOT has been a member and active participant in the National 511 Coalition since its inception in 2001. IDOT also applied for and received a 511 planning grant from the USDOT to develop a strategy, conceptual design, and implementation plan to deploy 511 services in Illinois. We are nearing completion of the planning studies and preparing to deploy 511 statewide in Illinois. This effort has involved many agencies and organizations throughout the state as stakeholders and partners in a multi-modal integrated 511 system. IDOT has also strived to include carrier and regulatory agency input to the plan and to provide opportunities for public-private partnerships as 511 services are developed and delivered to travelers throughout the state.

The Illinois 511 service is envisioned as a hybrid system with key components operated by IDOT and other public sector highway, transit, and public safety agencies, by private service providers, and with opportunities for premium services offered through the system by commercial entities. We believe this approach makes the most effective use of public and private expertise to meet the objectives set by the Commission in designating 511 for traveler information. We further believe that this approach will offer the best services to our customers and provide an opportunity for private commercial interests to both enhance the service and generate revenues.

With respect to the specific points raised in the comments filed by the wireless carriers and CTIA as they pertain to 511:

- 1) IDOT has worked with numerous public agency stakeholders to coordinate the development and deployment of 511 services in Illinois. IDOT intends to take the lead in deploying 511 and will do so in concert with these public agency partners so that there will be no ambiguity regarding which entities should have access to the 511 number in Illinois.
- 2) The Illinois 511 system design has focused significant effort on interoperability of our Illinois 511 system with neighboring 511 services. In fact, in our planning application and our plan we noted the intent to coordinate the development and

operation of Illinois 511 with the 511 systems being developed by Wisconsin and Indiana. This coordination is being realized through the three-state Gary-Chicago-Milwaukee ITS Priority Corridor Coalition (GCM Corridor). The Illinois 511 system is designed as the first in the nation to utilize the data sharing option outlined by the National 511 Coalition. The Illinois 511 system will use the GCM Gateway to accomplish the real-time sharing of traveler information data so that a caller to the Illinois 511 system will also be able to receive information on traffic conditions in the Milwaukee and Gary metro areas. In other cases, calls will be transferred to the neighboring system. We recognize the importance of this capability to users and are committed to working with our neighboring states and the carriers to identify and resolve issues as they arise in accordance with the National 511 Coalition interoperability guidelines.

- 3) The strategic plan for Illinois 511 recognizes and provides opportunities for partnering with private commercial interests to enhance and improve the Illinois 511 services. IDOT has a long history of making real-time traffic data available to many information service providers including the media at zero or nominal cost. We expect to continue to partner with private and commercial interests as the best way to get critical traveler information to the public. Rather than inhibit, we believe Illinois 511 will enhance such opportunities, and we are anxious to explore these with interested parties.

Thank you for the opportunity to submit comments to the Commission as you reconsider the designation of the 511 abbreviated dialing code. IDOT looks forward to deploying a 511 system that will enhance the services we provide to travelers throughout the state. The high level of usage of existing systems demonstrates that 511 is a valuable service to the public. We do not believe any additional rulemaking associated with 511 is necessary at this time. We urge the Commission to continue the current and successful policy related to 511 and IDOT will continue to work with the National 511 Coalition as we develop and deploy the Illinois 511 system.

Respectfully submitted,
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